

**IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

UNITED STATES OF AMERICA)	CRIMINAL NO.: 2:21-CR-341
)	
vs.)	MOTION TO FILE
)	ADDITIONAL MOTIONS
XAVIER WILLIAMS,)	
)	
Defendant.)	
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TO: JAMIE LEE NABORS SCHOEN, ASSISTANT UNITED STATES ATTORNEY

The Defendant, **XAVIER WILLIAMS**, by and through his undersigned attorney, hereby moves before the United States District Judge for the District of South Carolina, Charleston Division, for an Order allowing the Defendant to file additional Motions based upon evidence discovered as a result of the motions contemporaneously filed or based upon evidence developed pursuant to the motions of the Co-defendants. The Defendant's attorney has, therefore, not been able to determine all proper motions which should be filed in this matter and will not be able to do so until the Government produces discovery materials in response to the Defendant's and Co-defendant's motions.

Respectfully submitted,

s/ A. Peter Shahid, Jr.
 A. Peter Shahid, Jr., Esquire
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Dated: November 11, 2021